IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA CRIMINAL NO. 07-

> **DATE FILED: October 11, 2007** v.

DENNIS H. WILLIAMS VIOLATIONS:

> 18 U.S.C. § 115(a)(1)(B) (threatening to murder or assault a federal official - 1

count)

18 U.S.C. § 875(c) (making threats in

interstate commerce - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY FURTHER CHARGES THAT:

At times material to this indictment:

- 1. The Social Security Administration ("SSA") was an agency of the Executive Branch of the United States government. Thus, officials and employees of SSA were also officials and employees of the United States government.
- 2. Defendant DENNIS H. WILLIAMS was a recipient of Supplemental Security Income ("SSI") from the SSA, which is a federal program that provides cash benefits to individuals with disabilities.
- 3. During in or about August 2007, defendant DENNIS H. WILLIAMS was dissatisfied with the SSA's processing and payment of his SSI benefits and regularly communicated to employees of the SSA of his dissatisfaction, including making threats of violence if the employees did not do as he demanded.

- 4. On or about August 13, 2007, in a telephone call with an employee of the SSA, defendant DENNIS H. WILLIAMS threatened to commit acts of violence if he did not receive his SSI benefits promptly. Among other things, defendant WILLIAMS stated that, if he did not receive his SSI check soon, he would get a gun and start shooting people. Defendant WILLIAMS further stated that the only way to get the SSA employees to submit to his demands was to get a gun and start shooting people.
- 5. On or about August 14, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DENNIS H. WILLIAMS

knowingly threatened to assault and murder an official whose killing would be a crime under Title 18, United States Code, Section 1114, that is, employees of the SSA, with intent to impede, intimidate, and interfere with such officials while they were engaged in the performance of official duties, and with intent to retaliate against such officials on account of the performance of official duties.

In violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT TWO

THE GRAND JURY CHARGES THAT:

On or about August 13, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DENNIS H. WILLIAMS

transmitted in interstate commerce threats to injure the person of another, that is defendant WILLIAMS made threats to an employee of the United States Social Security Administration ("SSA") that he would obtain a gun and start shooting people because of his dissatisfaction with SSA employees.

In violation of Title 18, United States Code, Section 875(c).

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GRAND JURY FOREPERSON

PATRICK L. MEEHAN UNITED STATES ATTORNEY